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Attorneys for Defendants
SentinelOne, Inc., Tomer Weingarten, and David
Bernhardt

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAKARI JOHANSSON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

SENTINELONE, INC., TOMER
WEINGARTEN, and DAVID BERNHARDT,

Defendants.

Case No.: 4:23-CV-02786-HSG

**STIPULATION AND ORDER
EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT AND CONTINUING
CASE MANAGEMENT
CONFERENCE AND ASSOCIATED
DEADLINES**

STIP. AND ORDER EXTENDING TIME
TO RESPOND AND CONTINUING CMC

Case No.: 4:23-CV-02786-HSG

1 WHEREAS, this action is a proposed class action alleging violations of the federal
2 securities laws against SentinelOne, Inc., Tomer Weingarten and David Bernhardt (collectively,
3 “Defendants”);

4 WHEREAS, this action is subject to the requirements of the Private Securities Litigation
5 Reform Act of 1995, 15 U.S.C. § 78u-4, Pub. L. No. 104-67, 109 Stat. 737 (1995) (the
6 “PSLRA”), which sets forth specialized procedures for the administration of securities class
7 actions;
8

9 WHEREAS, the PSLRA provides for appointment of a Lead Plaintiff to act on behalf of
10 the purported class, which appointment shall not be made until after any motion to consolidate is
11 decided (15 U.S.C. § 78u-4(a)(3)(B)(ii));

12 WHEREAS, motions for Lead Plaintiff appointment are due August 7, 2023;

13 WHEREAS, the approval of lead counsel will follow the Court’s decision on the Lead
14 Plaintiff Motion(s);
15

16 WHEREAS, the parties expect Lead Plaintiff will thereafter file an amended complaint;

17 WHEREAS, Defendants anticipate moving to dismiss Lead Plaintiff’s complaint and that
18 the parties will submit a briefing schedule to the Court in connection with any such motion(s);

19 WHEREAS, because the PSLRA provides for (i) the consolidation of similar actions, if
20 any; (ii) appointment of Lead Plaintiff; and (iii) the filing of a single consolidated complaint by
21 Lead Plaintiff, requiring Defendants to respond to the existing complaint would result in the
22 needless expenditure of private and judicial resources;
23

24 WHEREAS, unless otherwise ordered by the Court, all discovery is stayed during the
25 pendency of any motion to dismiss under the PSLRA (15 U.S.C. § 78u-4(b)(3)(B));

26 WHEREAS, on June 6, 2023, this Court issued an Initial Case Management Scheduling
27 Order (ECF No. 6) in the above-captioned action with the following deadlines:
28

STIP. AND ORDER EXTENDING TIME
TO RESPOND AND CONTINUING CMC

1. August 15, 2023 for the parties to comply with certain requirements under the Federal Rules of Civil Procedure and the Northern District of California Civil Local Rules (“Local Rules” or “Civil L.R.”) and Alternative Dispute Resolution (“ADR”) Local Rules regarding initial disclosures, early settlement, ADR process, and discovery planning;
2. August 29, 2023 for the parties to file a Case Management Statement, a Rule 26(f) Report, or state any objections, and complete initial disclosures; and
3. September 5, 2023 at 2:00 p.m. for an Initial Case Management Conference; and

WHEREAS, counsel for the parties respectfully submit that because the pleadings are not yet set, and because, absent court order, discovery is stayed pending any motion(s) to dismiss, good cause exists to vacate the existing September 5, 2023 Initial Case Management Conference and associated deadlines until after such time as the Court has ruled on the appointment of Lead Plaintiff and lead counsel, as well as any motion(s) to dismiss;

IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 7-12, by and between the undersigned counsel for the parties, that:

- i. Pursuant to Civil L.R. 6-1(a), the Defendants’ obligation to answer, move, or otherwise respond to the complaint is extended until after the appointment of a Lead Plaintiff and lead counsel;
- ii. Within ten (10) days of the appointment of a Lead plaintiff and approval of lead counsel, the parties shall meet and confer and submit to the Court a mutually agreeable schedule for the filing of a consolidated or amended complaint and Defendants’ responses thereto;
- iii. Pursuant to Civil L.R. 16-2, the Initial Case Management Conference on September 5, 2023 is vacated, along with any associated deadlines under the

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Federal Rules of Civil Procedure and Civil Local Rules, to be reset for a date that is 30 days after the Court rules on Defendants' anticipated motion(s) to dismiss Lead Plaintiff's complaint, or such other date as the Court shall determine to be appropriate; and

iv. All associated ADR program deadlines likewise be deferred.

Dated: July 20, 2023

FENWICK & WEST LLP

By: /s/ Marie Bafus
Marie Bafus

Attorneys For Defendants
Sentinelone, Inc., Tomer Weingarten, and David
Bernhardt

Dated: July 20, 2023

GLANCY PRONGAY AND MURRAY LLP

By: /s/ Charles H. Linehan
Charles H. Linehan

Attorneys for Plaintiff
Sakari Johansson

Pursuant to Civil L.R. 5-1(h)(3), all signatories concur in filing this stipulation.

Dated: July 20, 2023


FENWICK & WEST LLP

By: /s/ Marie Bafus
Marie Bafus

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 7/21/2023


Hon. Haywood S. Gilliam, Jr.
United States District Court Judge

STIP. AND ORDER EXTENDING TIME
TO RESPOND AND CONTINUING CMC